REMARKS

Applicant respectfully requests consideration of the subject application as amended herein. This Amendment is submitted in response to a Non-Final Office Action mailed on December 17, 2004. Claims 1-8, 12, 16-23, 27 and 31 are rejected. In this amendment, claims 1, 16, 27 and 31 have been amended. No new matter has been added.

The Examiner objected to claim 27 because its language incorporates "The apparatus of claim 1," yet claim 1 is directed towards a method. Claim 27 has been amended to correct this inconsistency.

The Examiner rejected claims 16-30 under 35 U.S.C. § 101 because the claimed invention is directed to non-statutory subject matter. Claims 16-30 have been amended to overcome the Examiner's rejection under 35 U.S.C. § 101.

Claims 1, 3, 6-8, 12, 16, 18, 22-24, 27 and 31 are rejected under 35 U.S.C. §103(a) as being unpatentable over Pringle, et al. (U.S. Patent No. 6,470,306, hereinafter "Pringle"), in view of McQueen, (U.S. Patent No. 6,674,904, hereinafter "McQueen"). Claims 2 and 7 are rejected under 35 U.S.C. §103(a) as being unpatentable over Pringle, in view of McQueen, in further view of Schilit, et al., (U.S. Patent No. 6,670,968, hereinafter "Schilit"). Claims 4, 5 and 19-21 are rejected under 35 U.S.C. §103(a) as being unpatentable over Pringle, in view of McQueen, in further view of Chen, et al., (U.S. Patent No. 6,507,856, hereinafter "Chen"). As discussed below, the pending claims are patentable over the above references.

Pringle discloses a mechanism for translating an annotated source document in a first natural language to a target document in a second natural language having corresponding annotations. A source document is divided into first language tokens (also referred to as word tokens), annotation tokens that apply to the first language tokens, and ending tokens. Prior to translation, the annotation tokens are removed from the first token string. After the

3399P048

word tokens have been translated into second language tokens, the annotation tokens are inserted at appropriate locations in the second token string.

Pringle specifically discloses that the word tokens include "individual punctuation marks; groups of letters that form words", and the annotation tokens include "groups of letters, characters or symbols that form annotations" (col. 11, lines 47-51). Hence, in Pringle, the first token string includes the same values as the source document, except that these values may be grouped to define tokens. In the presently claimed invention, in contrast, the converted string includes values that replaced the original values of the source hypermedia document. In particular, the converted string contains a plurality of first values that replaced formatting code segments of the source hypermedia document and a plurality of second values that replaced text segments of the source hypermedia document. Pringle does not teach or suggest converting a hypermedia document into a string containing a plurality of first values and a plurality of second values, with the plurality of first values replacing a plurality of formatting code segments within the hypermedia document and the plurality of second values replacing a plurality of text segments within the hypermedia document, as does the presently claimed invention. And as the Examiner admitted, neither does Pringle teach or suggest applying a low-pass filter to the string containing a plurality of first values and a plurality of second values, and determining the location of the main content within the hypermedia document using the output of the low-pass filter. Hence, Pringle lacks the features of the present invention that are contained in the following language of claim 1:

...converting the hypermedia document including into a string containing a plurality of first values and a plurality of second values, the plurality of first values replacing a plurality of formatting code segments within the hypermedia document and the plurality of second values replacing a plurality of text segments within the hypermedia document;

applying a low-pass filter to the string containing the plurality of first values and the plurality of second values; and

determining location of the main content within the hypermedia document using an output of the low-pass filter.

Similar language is also included in claims 16 and 31.

The Examiner acknowledges that "Pringle does not specifically teach applying a low-pass filter to the string and determining location of the main content within the hypermedia document using the low-pass filter" and cites McQueen for such teaching, contending it would be obvious to combine Pringle with McQueen to produce the present invention.

Applicant respectfully disagrees.

McQueen discloses an edge detection algorithm that uses contour tracing and boundary detection for object identification in a digital image. However, McQueen does not teach or suggest at least converting a hypermedia document into a string containing a plurality of first values and a plurality of second values, with the plurality of first values replacing a plurality of formatting code segments within the hypermedia document and the plurality of second values replacing a plurality of text segments within the hypermedia document, as does the presently claimed invention. Accordingly, McQueen lacks the same feature of the presently claimed invention that is missing from Pringle. This feature is also missing from Schilit and Chen cited by the Examiner.

Accordingly, Pringle, McQueen, Schilit and Chen, taken alone or in combination, do not teach or suggest the present invention as claimed in claims 1, 16 and 31, and their corresponding dependent claims.

Thus, Applicant respectfully requests the withdrawal of the rejection under 35 U.S.C. § 103(a) and submits that the pending claims are in condition for allowance. Applicant respectfully requests reconsideration of the application and allowance of the pending claims.

If the Examiner determines the prompt allowance of these claims could be facilitated

by a telephone conference, the Examiner is invited to contact Marina Portnova at (408) 720-

8300.

Allowable Subject Matter

Applicant thanks the Examiner for indicating that claims 32-39 are allowed.

Deposit Account Authorization

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any

charges that may be due. Furthermore, if an extension is required, then Applicant hereby

requests such extension.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR

& ZAFMAN LLP

Dated: March 14, 2005

Marina Portnova

Attorney for Applicant

Registration No. 45,750

12400 Wilshire Boulevard

Seventh Floor

Los Angeles, CA 90025-1026

(408) 720-8300

3399P048

15